

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRETT T. CULVER

Plaintiff,

v.

JOHN DOE (Presumably  
S.C.I. Mahanoy Property Personnel),  
et al.

Defendants.

FILED  
HARRISBURG, PA  
Plaintiff's  
First Set Of  
Interrogatories

SEP - 8 2003 Case No. 1:01-cv-00904

MARY E. D'ANDREA, CLERK (Judge Kane)  
Per [Signature]  
Deputy Clerk

In accordance with Rule 33 of the Federal Rules of Civil Procedures, Plaintiff Brett T. Culver requests that Defendant John Doe answer the following interrogatories separately and fully in writing under oath, and that the answers be signed by the person making them, and be served on plaintiff within 45 days of service hereof.

In responding to these interrogatories, furnish all information which is available to you, including information in the possession of your attorneys or investigators for your attorneys, and not merely information known of your own personal knowledge.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state, and answer to the extent possible, specifying your inability to answer the remainder, and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing so as to require supplemental answers as new, unanswered, and different information materializes.

1. Produce all record and documentation of any and all property inventories of plaintiff's personal property since his arrival at the S.C.I. Mahanoy facility to present.
2. Produce any and all legal documents belonging to plaintiff which have been seized by S.C.I. Mahanoy staff at any time during the plaintiff's detainment, namely the legal documents/records seized by C.O. Miknich on 04-13-00.
3. Cite name, badge or identification number of any handlers or recipients of items DC-154A No. 150818, time and dates each person handled and/or received possession and responsibility of said items, location items were exchanged/received, locations items were taken, and the present or last known location or whereabouts of items DC-154A No. A 150818.
4. Cite names and title of any persons who, of your knowledge, viewed or had access to the seized items DC-154A No. A 150818, including the date, times, location of such described conduct or contact.

5. Explain any information or insight you might have as to why the plaintiff's legal documents/records (DC-154A No. A 150818) were not returned to his possession, and by who's authority or order were the plaintiff's legal documents/records not returned to the plaintiff (04-13-00 to present).
6. Explain the present disposition of items DC-154A No. A 150818, the present location of items, and the name of person or authority presently responsible for the items DC-154A No. A 150818 and their care.
7. Provide record and documentation of other seized/confiscated property belonging to plaintiff by S.C.I. Manana staff on the dates of 09-14-00, 12-07-00, and 12-19-00, including reasons each item of property was seized from plaintiff, and the whereabouts of those seized/confiscated items from the cited dates of confiscation.
8. Explain what reasons, policy, or authority prevented the return of confiscated items 09-14-00, 12-07-00, and 12-19-00 belonging to plaintiff, and why the items continue to be withheld from the plaintiff.
9. Do you, any other employee, your attorneys have any knowledge of any item mentioned herein being altered, lost, or destroyed?
10. If yes to # 9,
  - (a) Explain;
  - (b) Cite instances, items, locations, dates, times;
  - (c) Cite names and addresses of persons involved or knowledgeable of relevant events, facts, or subject matter described herein.

Dated and served:                     

By